## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LINDA LEWIS-RICE,

Plaintiff,

v.

Case No.: 1:07-cv-06525

THE PRUDENTIAL INSURANCE COMPANY OF AMERICA.

Defendant.

Judge Marvin E. Aspen Magistrate Judge Arlander Keys

## <u>DEFENDANT'S UNOPPOSED MOTION FOR A THIRTY (30) DAY ENLARGEMENT</u> <u>OF TIME TO ANSWER OR OTHERWISE PLEAD</u>

Defendants The Prudential Insurance Company of America ("Prudential"), by its undersigned counsel respectfully moves this Honorable Court for entry of an order granting it an enlargement of time of thirty (30) days within which to file its responsive pleadings to Plaintiff Linda Lewis-Rice's ("Plaintiff") Complaint and in support thereof states as follows:

- 1. On November 16, 2007, Plaintiff filed her Complaint with the United States District Court of the Northern District of Illinois. [Docket #1] Prudential was served on November 26, 2007. Prudential's responsive pleading is currently due on December 17, 2007.
- 2. Counsel for Prudential was recently retained, and is currently investigating the allegations contained in the Complaint and gathering documents relevant to the Complaint, but requires an additional thirty (30) days to file Prudential's responsive pleadings to Plaintiff's Complaint.
- 3. Counsel for Prudential, Edna S. Bailey, contacted Counsel for Plaintiff, Mark D. DeBofsky, on December 4, 2007, requesting his agreement to an extension of time to file Prudential's responsive pleadings. Plaintiff's counsel has no objection to the relief requested.

4. Plaintiff will not be prejudiced by the grant of an extension of time to answer or otherwise plead to Prudential.

WHEREFORE, Defendant The Prudential Insurance Company of America respectfully requests that this Honorable Court grants it an additional thirty (30) days to January 16, 2007 to file its responsive pleading to Plaintiff's Complaint.

Respectfully Submitted,

THE PRUDENTIAL INSURANCE COMPANY OF AMERICA, Defendant

By: \_\_/s/ Edna S. Bailey
One of Its Attorneys

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## **CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on December 10, 2007, a copy of the foregoing was served by operation of the Court's electronic filing systems upon the following:

Attorney for Plaintiff
Mark D. DeBofsky
Daley DeBofsky & Bryant
55 West Monroe Street, Suite 2440
Chicago, Illinois 60602

Parties may access this filing through the Court's system.

<u>/s/ Edna S. Bailey</u> Edna S. Bailey (IL 6277775)